

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

TRUE RELIGION APPAREL, INC.; GURU DENIM, INC.,

Plaintiffs,

v.

XIAOKANG LEI D/B/A TRUERELIGIONJEANS4OUTLET.COM;  
LIN JIANYU D/B/A TRUERELIGIONJEANSOUTLET8.COM;  
ZHAO YANG QU D/B/A TRUERELIGION2CHEAP.COM;  
RONGLIAN LU D/B/A TOPTRJEANS.COM;  
FORTRUERELIGIONJEANS.COM D/B/A  
FASHIONJEANSHOP@GMAIL.COM; XIN JIE KOU D/B/A  
TRUERELIGIONSALE.CO.UK; JIAQIAO LV D/B/A  
TRUERELIGION2CHEAP.COM; ZHAO YANG QU D/B/A  
TRUERELIGION2CHEAP.COM; WANGMING D/B/A  
JEANSWHOLESALING.COM;  
SERVICE@TRUERELIGIONLIKE.COM D/B/A  
OBCS001@HOTMAIL.COM D/B/A TRUERELIGIONLIKE.COM;  
CHEAPERTRUERELIGIONJEANS.NET D/B/A  
JACKROSEGATES@GMAIL.COM; XIAOYU CHEN D/B/A  
SH12345602@HOTMAIL.COM D/B/A  
CHEAPTRUERELIGIONJEANSOUTLETS.COM; LUCY KING  
D/B/A LUCYKING88@YAHOO.COM D/B/A  
MYFASHIONJEANS.COM; TOM SMITH D/B/A  
KICKSONFOOT@GMAIL.COM D/B/A  
BUYTRUERELIGIONJEANS.NET D/B/A QIQUWANG.NET; QIN  
KE D/B/A  
CHEAPTRUERELIGIONJEANSSALE@HOTMAIL.COM D/B/A  
MRSHUANG123@HOTMAIL.COM; TAN JUN D/B/A  
WORLD203@HOTMAIL.COM D/B/A  
BTWGOLD4@HOTMAIL.COM; JINGSHUN HUANG D/B/A  
HAOTIAN INTERNATIONAL INDUSTRIAL CO., LTD. D/B/A  
NIKECOOL.COM; CHEN JINSHAN D/B/A HONG KONG TIMES  
SQUARE TRADING CO., LTD. D/B/A V9MAIL.COM; CHEN  
ZHIFENG D/B/A ZHIF\_CHEN@163.COM D/B/A HONG KONG  
JAVON TRADE LTD. D/B/A TINRUI.COM; LI FENGNIAN  
D/B/A FENG08183@SOHU.COM D/B/A CHEAP SKYS CO. LTD.  
D/B/A CHEAP-SKYS.COM; SHOES-GOOGLE CO., LTD. D/B/A  
GOTRADINGZONE.COM D/B/A  
GOTRADINGZONE@HOTMAIL.COM; GUOFANG XIAO D/B/A  
EMAIL598269039@QQ.COM D/B/A TONGHE TRADE CO., LTD.  
D/B/A THE9THSTREET.COM; BRANDSTRIBE CO., LTD. D/B/A  
BRANDSTRIBE.COM D/B/A ALICEWENNE@HOTMAIL.COM

Case No. 11-Civ-8242 (HB)

D/B/A SALES@BRANDSTRIBE.COM D/B/A  
 BRANDSTRIBE@HOTMAIL.COM D/B/A  
 BRANDSTRIBEINFO@YAHOO.COM; XUBEICHAO D/B/A  
 TRADEMEMOMENT CO. LTD. D/B/A TRADEMOMENT.COM;  
 YEMAO D/B/A SHUNYUAN INTERNATIONAL EXPORT CO.  
 D/B/A TRADE88N.COM D/B/A TRADE88CN@HOTMAIL.COM;  
 WANG FOYUN D/B/A FASHIONCHOOSE TRADE CO., LTD.  
 D/B/A FASHIONCHOOSE.COM D/B/A  
 WYZSHOES@HOTMAIL.COM; WWW.BESTKF.COM D/B/A  
 WZJ886@LIVE.CN D/B/A WUQIUPING2004@163.CN;  
 CHENZHONG D/B/A FASHION TRADING COMPANY D/B/A  
 FASHION2011STORE.COM D/B/A ZOU1973@HOTMAIL.COM;  
 ALLEN IEE D/B/A CHEER TRADE COMPANY D/B/A  
 CHEERWHOLESALE.COM; LIN HAO D/B/A HONG KONG  
 FAIRY INTERNATIONAL, LTD. D/B/A MORIVER-TRADE.COM  
 D/B/A MOONRIVER-TRADE@HOTMAIL.COM; XIAO XU  
 D/B/A TRADEVOID SHOES TRADING CO., LTD. D/B/A  
 TRADEVOID.COM; HUANG JINFENG D/B/A HAPPY SPORTS  
 INDUSTRY CO., LTD. D/B/A PENGFASHIONSHOES.COM; WEI  
 JIANGGUANG D/B/A CHINARG002@126.COM D/B/A  
 LONGFENG INDUSTRY CO., LTD. D/B/A  
 LONGFENGTRADE.COM; XIAOFANG NI D/B/A WIWI TRADE  
 CO., LTD. D/B/A WIWITRADE.COM D/B/A  
 WIWITRADE@HOTMAIL.COM; CHEN ZIU SONG D/B/A  
 LRGJEANS008@HOTMAIL.COM D/B/A JERSEY TRADE CO.  
 LTD. D/B/A AAANBAJERSEY.COM; HONEST99896 D/B/A  
 DAJIAHAO662009@HOTMAIL.COM; FERSHOUHELLO D/B/A  
 XUHUAN0123@YAHOO.COM.CN; ZHAOMIN8898 D/B/A  
 ZHAOMIN82@YAHOO.COM; TUNIAN1 D/B/A  
 402590112@QQ.COM; LINA669925 D/B/A  
 YANGYINGHUI0123@YAHOO.COM.CN; TRUEYES85 D/B/A  
 LYGANG2010@YAHOO.COM.CN;  
 TRUERELIGIONJEANSFORCHEAP.COM D/B/A  
 TRUERELIGIONCHEAPCOM@GMAIL.COM;  
 TRUERELIGIONJEANOUTLET1.COM D/B/A  
 XIAOLUAAAA@126.COM; ZHANG LI D/B/A  
 TRUERELIGIONJEANSDISCOUNTED.COM; XIAXINZHEN  
 D/B/A ULSTYLE.COM; YITAO TRADING CO., LTD. D/B/A  
 CHEAPTRUERELIGIONJEANSFORSALE.NET; WANG ZHONG  
 D/B/A CLOTHINGSHOES777.COM; USA-JEANS.COM D/B/A  
 NFLTM@HOTMAIL.COM; TRUERELIGION1-JEANS.COM  
 D/B/A JDIFUWR3434@GMAIL.COM; LU REN JIA D/B/A  
 BESTTRUERELIGIONJEANS.COM; ANDY HUANG D/B/A  
 BRANDTSHIRT.COM; SHOUDAO DU D/B/A  
 FAKETRUERELIGION.NET; TRUERELIGIONES.COM D/B/A  
 ANDY51988@VIP.163.COM; ZHANG MINGMING D/B/A  
 TRUERELIGIONOUTLET.INFO; LIN LIN D/B/A SALE-

TRUERELIGIONJEANS.ORG;  
 CHEAPTRUERELIGION.US D/B/A  
 CHEAPTRUERELIGION@126.COM; KE XIANHONG D/B/A  
 POEON.COM; SAN ZHANG D/B/A  
 BUYTRUERELIGIONJEANS.US; CGLILII D/B/A  
 TRJEANSK.COM; TOM BONO D/B/A DSQUARED2SALE.NET;  
 PERRY WILLIS D/B/A DSQUARED2SALES.COM; ZHOU BING  
 D/B/A ATTRUERELIGIONBRAND.COM;  
 OUTELTRUERELIGION.COM D/B/A  
 OUTLETTRUERELIGION@GMAIL.COM; ZHANG FENG D/B/A  
 TRUERELIGIONOUTLET-JEANS.INFO; ZHANG XIAO HAI  
 D/B/A HOTJEANSELL.COM; JIANFENG LIN D/B/A  
 TRUERELIGIONTROFFICIAL.COM; LINGUOQING D/B/A  
 TRUERELIGIONJEANSWEB.COM; ZHENG RUISHAN D/B/A  
 TRUERELIGIONOUTLETFORCHEAP.COM; LIN ZHEN D/B/A  
 JEANSCLASSIC.NET; WU XIA D/B/A  
 TRUEJEANSRELIGIONSALE.COM; CHENG LIN D/B/A  
 TRUERELIGIONOUTLETONLINE.NET;  
 TRUERELIGIONSERIES.NET D/B/A 43388@GMAIL.COM;  
 CHEN JIANHUI D/B/A BRANDJEANSSUPPLY.COM;  
 CHEAPJEANS4SALES.COM D/B/A  
 SERVICE@JEANSOUTLET.COM;  
 PICKTRUERELIGIONJEANS.COM D/B/A  
 SALE@TRUERELIGIONJEANSCHEAP.NET; WEI ZHI D/B/A  
 RELIGIONJEANSUK.COM; TRUERELIGIONAUSTRALIA.INFO  
 D/B/A AIRMAXSHOESFRANCE@HOTMAIL.COM; AMIR  
 ASYRAF D/B/A TRUERELIGIONJEANSDEAL.COM; LIYUAN  
 D/B/A THETRUERELIGIONJEANSOUTLET.US; ALICIA DAVID  
 D/B/A TRUERELIGIONJEANS4CHEAP.COM; CHAMP QUEEN  
 D/B/A TRUERELIGIONJEANSALES.COM; DONTE SKEHAN  
 D/B/A TRUERELIGIONJEANS7.COM; LI DUODUO D/B/A  
 TRUERELIGIONSTORE.US; ZHOU KAI D/B/A JEANS-TRUE-  
 RELIGION-OUTLET.COM; LIWENYANG D/B/A  
 TRJEANSONLINESHOP.COM; MIKE TOM D/B/A TRUE-  
 RELIGION-OUTLET-JEANS.INFO; LIU QING D/B/A  
 TRUERELIGIONSALESTORE.COM;  
 TRUERELIGIONJEANCANADA.INFO D/B/A  
 RELIABLEVIPSERVICE@GMAIL.COM; ZHENCHENG CHEN  
 D/B/A INTRUERELIGION.COM; HALY DENG D/B/A  
 CHEAPTRUERELIGIONSHOP.COM; ZHENG SNOW D/B/A  
 JEANSFAKE.ORG; LUIGI FULK D/B/A  
 TRUERELIGIONJEANSOK.COM; ZHIYONG YANG D/B/A  
 TRUERELIGIONOUTLETES.COM; LIU JIUCHUAN D/B/A  
 TRUERELIGION-OUTLET.NET; GAO JIANGUO D/B/A  
 OUTLET-TRUERELIGION.COM; LIN YANG D/B/A  
 TRUERELIGIONJIANS.COM; SIXI ZHOU D/B/A  
 TRADEHONG.COM; LIN HUI D/B/A CHEAPUSAJEANS.COM;

JUNJUN CHEN D/B/A GUCCICLOTHINGCHINA.COM; ZENG WEI D/B/A CLOTHINGSHELF.COM; ZHIFENG LIANG D/B/A FANGLE-BRANDS.COM; ZHOU GUOJUN D/B/A TRUERELIGIONZONE.COM; CHEN HAO D/B/A CHEAPJEANS-OUTLET.COM; MIKE JORDAN D/B/A TRUERELIGIONJEANOUTLET.COM; LUYIQI LTD D/B/A CHEAPTRUERELIGIONJEANSFORSALE.COM; ZHANG MILLER D/B/A CHEAPESTTRUERELIGION.COM; XYZ COMPANIES, AND JOHN AND JANE DOES,

Defendants.

**[PROPOSED] DEFAULT JUDGMENT AND  
PERMANENT INJUNCTION ORDER**

This action having been commenced by TRUE RELIGION APPAREL, INC. and GURU DENIM, INC. (collectively, “True Religion” or “Plaintiffs”) against Defendants XIAOKANG LEI d/b/a TRUERELIGIONJEANS4OUTLET.COM; LIN JIANYU d/b/a TRUERELIGIONJEANSOUTLET8.COM; ZHAO YANG QU d/b/a TRUERELIGION2CHEAP.COM; RONGLIAN LU d/b/a TOPTRJEANS.COM; FORTTRUERELIGIONJEANS.COM d/b/a FASHIONJEANSHOP@GMAIL.COM; XIN JIE KOU d/b/a TRUERELIGIONSALE.CO.UK; JIAQIAO LV d/b/a TRUERELIGION2CHEAP.COM; ZHAO YANG QU d/b/a TRUERELIGION2CHEAP.COM; WANGMING d/b/a JEANSWHOLESALING.COM; SERVICE@TRUERELIGIONLIKE.COM d/b/a OBCS001@HOTMAIL.COM d/b/a TRUERELIGIONLIKE.COM; CHEAPERTRUERELIGIONJEANS.NET d/b/a JACKROSEGATES@GMAIL.COM; XIAOYU CHEN d/b/a SH12345602@HOTMAIL.COM d/b/a CHEAPTRUERELIGIONJEANSOUTLETS.COM; LUCY KING d/b/a LUCYKING88@YAHOO.COM d/b/a MYFASHIONJEANS.COM; TOM SMITH d/b/a KICKSONFOOT@GMAIL.COM d/b/a BUYTRUERELIGIONJEANS.NET d/b/a

QIQUWANG.NET; QIN KE d/b/a CHEAPTRUERELIGIONJEANSSALE@HOTMAIL.COM  
d/b/a MRSHUANG123@HOTMAIL.COM; TAN JUN d/b/a WORLD203@HOTMAIL.COM  
d/b/a BTWGOLD4@HOTMAIL.COM; JINGSHUN HUANG d/b/a HAOTIAN  
INTERNATIONAL INDUSTRIAL CO., LTD. d/b/a NIKECOOL.COM; CHEN JINSHAN d/b/a  
HONG KONG TIMES SQUARE TRADING CO., LTD. d/b/a V9MAIL.COM; CHEN ZHIFENG  
d/b/a ZHIF\_CHEN@163.COM d/b/a HONG KONG JAVON TRADE LTD. d/b/a TINRUI.COM;  
LI FENGNIAN D/B/A FENG08183@SOHU.COM D/B/A CHEAP SKYS CO. LTD. d/b/a  
CHEAP-SKYS.COM; SHOES-GOOGLE CO., LTD. d/b/a GOTRADINGZONE.COM d/b/a  
GOTRADINGZONE@HOTMAIL.COM; GUOFANG XIAO d/b/a  
EMAIL598269039@QQ.COM d/b/a TONGHE TRADE CO., LTD. d/b/a  
THE9THSTREET.COM; BRANDSTRIBE CO., LTD. d/b/a BRANDSTRIBE.COM d/b/a  
ALICEWENNE@HOTMAIL.COM D/B/A SALES@BRANDSTRIBE.COM d/b/a  
BRANDSTRIBE@HOTMAIL.COM D/B/A BRANDSTRIBEINFO@YAHOO.COM;  
XUBEICHAO d/b/a TRADEMEMOMENT CO. LTD. d/b/a TRADEMOMENT.COM; YEMAO  
d/b/a SHUNYUAN INTERNATIONAL EXPORT CO. d/b/a TRADE88N.COM d/b/a  
TRADE88CN@HOTMAIL.COM; WANG FOYUN D/B/A FASHIONCHOOSE TRADE CO.,  
LTD. d/b/a FASHIONCHOOSE.COM d/b/a WYZSHOES@HOTMAIL.COM;  
WWW.BESTKF.COM d/b/a WZJ886@LIVE.CN d/b/a WUQIUPING2004@163.CN;  
CHENZHONG d/b/a FASHION TRADING COMPANY d/b/a FASHION2011STORE.COM  
D/B/A ZOU1973@HOTMAIL.COM; ALLEN IEE d/b/a CHEER TRADE COMPANY d/b/a  
CHEERWHOLESALE.COM; LIN HAO d/b/a HONG KONG FAIRY INTERNATIONAL, LTD.  
d/b/a MORIVER-TRADE.COM d/b/a MOONRIVER-TRADE@HOTMAIL.COM; XIAO XU  
d/b/a TRADEVOID SHOES TRADING CO., LTD. d/b/a TRADEVOID.COM; HUANG  
JINFENG d/b/a HAPPY SPORTS INDUSTRY CO., LTD. d/b/a PENGFASHIONSHOES.COM;

WEI JIANGGUANG d/b/a CHINARG002@126.COM d/b/a LONGFENG INDUSTRY CO., LTD. d/b/a LONGFENGTRADE.COM; XIAOFANG NI d/b/a WIWI TRADE CO., LTD. d/b/a WIWITRADE.COM d/b/a WIWITRADE@HOTMAIL.COM; CHEN ZIU SONG D/B/A LRGJEANS008@HOTMAIL.COM d/b/a JERSEY TRADE CO. LTD. d/b/a AAANBAJERSEY.COM; HONEST99896 d/b/a DAJIAHAO662009@HOTMAIL.COM; FERSHOUHELLO d/b/a XUHUAN0123@YAHOO.COM.CN; ZHAOMIN8898 d/b/a ZHAOMIN82@YAHOO.COM; TUNIAN1 d/b/a 402590112@QQ.COM; LINA669925 d/b/a YANGYINGHUI0123@YAHOO.COM.CN; TRUEYES85 d/b/a LYANG2010@YAHOO.COM.CN; TRUERELIGIONJEANSFORCHEAP.COM d/b/a TRUERELIGIONCHEAPCOM@GMAIL.COM; TRUERELIGIONJEANOUTLET1.COM d/b/a XIAOLUAAAA@126.COM; ZHANG LI d/b/a TRUERELIGIONJEANSDISCOUNTED.COM; XIAINZHEN d/b/a ULSTYLE.COM; YITAO TRADING CO., LTD. d/b/a CHEAPTRUERELIGIONJEANSFORSALE.NET; WANG ZHONG D/B/A/ CLOTHINGSHOES777.COM; USA-JEANS.COM d/b/a NFLTM@HOTMAIL.COM; TRUERELIGION1-JEANS.COM D/B/A JDIFUWR3434@GMAIL.COM; LU REN JIA d/b/a BESTTRUERELIGIONJEANS.COM; ANDY HUANG d/b/a BRANDTSHIRT.COM; SHOUDAO DU D/B/A FAKETRUERELIGION.NET; TRUERELIGIONES.COM d/b/a ANDY51988@VIP.163.COM; ZHANG MINGMING d/b/a TRUERELIGIONOUTLET.INFO; LIN LIN d/b/a SALE-TRUERELIGIONJEANS.ORG; CHEAPTRUERELIGION.US d/b/a CHEAPTRUERELIGION@126.COM; KE XIANHONG d/b/a POEON.COM; SAN ZHANG d/b/a BUYTRUERELIGIONJEANS.US; CGLILII d/b/a TRJEANSK.COM; TOM BONO d/b/a DSQUARED2SALE.NET; PERRY WILLIS d/b/a DSQUARED2SALES.COM; ZHOU BING d/b/a ATTRUERELIGIONBRAND.COM; OUTELTRUERELIGION.COM d/b/a OUTLETTRUERELIGION@GMAIL.COM; ZHANG FENG d/b/a TRUERELIGIONOUTLET-

JEANS.INFO; ZHANG XIAO HAI d/b/a HOTJEANSELL.COM; JIANFENG LIN d/b/a  
TRUERELIGIONTROFFICIAL.COM; LINGUOQING d/b/a  
TRUERELIGIONJEANSWEB.COM; ZHENG RUISHAN d/b/a  
TRUERELIGIONOUTLETFORCHEAP.COM; LIN ZHEN d/b/a JEANSCLASSIC.NET; WU  
XIA d/b/a TRUEJEANSRELIGIONSALE.COM; CHENG LIN d/b/a  
TRUERELIGIONOUTLETONLINE.NET; TRUERELIGIONSERIES.NET D/B/A  
43388@GMAIL.COM; CHEN JIANHUI d/b/a BRANDJEANSSUPPLY.COM;  
CHEAPJEANS4SALES.COM d/b/a SERVICE@JEANSOUTLET.COM;  
PICKTRUERELIGIONJEANS.COM d/b/a SALE@TRUERELIGIONJEANSCHEAP.NET; WEI  
ZHI d/b/a RELIGIONJEANSUK.COM; TRUERELIGIONAUSTRALIA.INFO D/B/A  
AIRMAXSHOESFRANCE@HOTMAIL.COM; AMIR ASYRAF d/b/a  
TRUERELIGIONJEANSDEAL.COM; LIYUAN d/b/a  
THETRUERELIGIONJEANSOUTLET.US; ALICIA DAVID d/b/a  
TRUERELIGIONJEANS4CHEAP.COM; CHAMP QUEEN d/b/a  
TRUERELIGIONJEANSALES.COM; DONTE SKEHAN d/b/a  
TRUERELIGIONJEANS7.COM; LI DUODUO d/b/a TRUERELIGIONSTORE.US; ZHOU KAI  
d/b/a JEANS-TRUE-RELIGION-OUTLET.COM; LIWENYANG d/b/a  
TRJEANSONLINESHOP.COM; MIKE TOM d/b/a TRUE-RELIGION-OUTLET-JEANS.INFO;  
LIU QING d/b/a TRUERELIGIONSALESTORE.COM;  
TRUERELIGIONJEANCANADA.INFO D/B/A RELIABLEVIPSERVICE@GMAIL.COM;  
ZHENCHENG CHEN d/b/a INTRUERELIGION.COM; HALY DENG d/b/a  
CHEAPTRUERELIGIONSHOP.COM; ZHENG SNOW d/b/a JEANSFAKE.ORG; LUIGI FULK  
d/b/a TRUERELIGIONJEANSOK.COM; ZHIYONG YANG d/b/a  
TRUERELIGIONOUTLETES.COM; LIU JIUCHUAN d/b/a TRUERELIGION-OUTLET.NET;

GAO JIANGUO d/b/a OUTLET-TRUERELIGION.COM; LIN YANG d/b/a  
 TRUERELIGIONJIANS.COM; SIXI ZHOU d/b/a TRADEHONG.COM; LIN HUI d/b/a  
 CHEAPUSAJEANS.COM; JUNJUN CHEN d/b/a GUCCICLOTHINGCHINA.COM; ZENG  
 WEI d/b/a CLOTHINGSHELF.COM; ZHIFENG LIANG d/b/a FANGLE-BRANDS.COM;  
 ZHOU GUOJUN d/b/a TRUERELIGIONZONE.COM; CHEN HAO d/b/a CHEAPJEANS-  
 OUTLET.COM; MIKE JORDAN d/b/a TRUERELIGIONJEANOUTLET.COM; LUYIQI LTD  
 d/b/a CHEAPTRUERELIGIONJEANSFORSALE.COM and ZHANG MILLER D/B/A  
 CHEAPESTTRUERELIGION.COM (collectively, “Defendants”) for a Temporary Restraining  
 Order, Order to Disable Certain Web Sites, Asset Restraining Order, Expedited Discovery Order  
 and Order to Show Cause for Preliminary Injunction (collectively, the “Temporary Restraining  
 Order”) pursuant to Federal Rule of Civil Procedure 65 and the Trademark Act of 1946, 15 U.S.C.  
 §§ 1051, *et seq.*, as amended by the Trademark Counterfeiting Act of 1984, Public Law 98-473  
 (October 12, 1984), the Anticybersquatting Consumer Protection Act of 1996, Pub. L. 104-153  
 (July 2, 1996), and the Prioritizing Resources and Organization for Intellectual Property Act of  
 2007, H.R. 4279 (October 13, 2008) (the “Lanham Act”), and the Copyright Act, 17 U.S.C. §§  
 501, 17 U.S.C. § 106, *et. seq.*, for the reason that Defendants are distributing, offering for sale  
 and/or selling, via the Internet, goods bearing counterfeit reproductions of the True Religion’s  
 federally registered trademarks and copyrights, as listed in True Religion’s Complaint and  
 incorporated herein by reference, which trademarks (collectively, the “TRUE RELIGION Marks”)  
 and copyrights (the “True Religion Copyrights”) are owned and controlled by True Religion and  
 used in connection with products listed in the True Religion’s Complaint and incorporated herein  
 by reference (collectively, the “True Religion Products”), and the Court having reviewed the  
 Complaint, Memorandum of Law in support of the Temporary Restraining Order, supporting  
 declarations and exhibits, issued such a Temporary Restraining Order on November 17, 2011 and

subsequently on November 30, 2011 issued a Preliminary Injunction Order (“Preliminary Injunction”); and

Defendants having each been properly served with the Temporary Restraining Order, Complaint, Summons and supporting papers, including notice of the show cause hearing held on November 30, 2011 at 11:00 a.m. in Courtroom 23B in the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007; and

Plaintiff having filed an Amended Complaint and Amended Summons on December 22, 2011 naming additional defendants; and

Defendants having each been properly served with the Amended Complaint, Amended Summons and Preliminary Injunction; and

None of the Defendants having appeared at the show cause hearing, filed a response to the True Religion’s moving papers or otherwise appeared in this action; and

The Clerk of Court having entered a default against each Defendant on February 7, 2012; and

True Religion having moved for final default judgment under Fed. R. Civ. P. 55(b) and True Religion having shown, *inter alia*, the following:

1. True Religion owns all right, title and interest in and to the TRUE RELIGION Marks and True Religion Copyrights in connection with the True Religion Products and that the TRUE RELIGION Marks and True Religion Copyrights are valid and protectable and entitled to protection; and

2. Defendants are manufacturing, distributing, offering for sale and/or selling counterfeit products -- including, *inter alia*, jeans, sportswear, accessories and other products -- bearing counterfeits of the TRUE RELIGION Marks and TRUE RELIGION Copyrights (“Counterfeit Products”) to buyers in the United States, including in this Judicial District; and

3. Defendants are selling Counterfeit Products by operating a network of web sites (“Defendants’ Infringing Web Sites”) resolving at various domain names set forth in Exhibit 1 attached hereto, including, without limitation, domain names containing the TRUE RELIGION Marks (the “Infringing Domain Names”); and

4. Defendants have gone to great lengths to conceal themselves and their ill-gotten proceeds from True Religion’s and this Court’s detection including by using multiple false identities and addresses associated with their operations as well as purposely-deceptive contact information; and

5. To the best of True Religion’s knowledge, Defendants are not infants, incompetent or in the military service of the United States; and

6. Defendants have disregarded the Temporary Restraining Order and Preliminary Injunction; and so the Court:

HEREBY FINDS that each Defendant is liable for federal trademark counterfeiting and infringement under 15 U.S.C. §§ 1114, 1117, trademark cybersquatting under 15 U.S.C. § 1125(d)(1), and willful copyright infringement under 17 U.S.C. § 504(c)(2), and this Default Judgment and Permanent Injunction Order (“Permanent Injunction”) is entered against each Defendant.

THEREFORE, IT IS HEREBY ORDERED that Defendants, their officers, agents servants and employees and any persons in active concert or participation with them are permanently enjoined and restrained from:

(i) using the TRUE RELIGION Marks and True Religion Copyrights or any reproduction, counterfeit, copy or colorable imitation of the TRUE RELIGION Marks and True Religion Copyrights in connection with the distribution, advertising, offer for sale and/or sale of merchandise not the genuine products of True Religion; and

(ii) passing off, inducing or enabling others to sell or pass off any Counterfeit Products as and for True Religion Products; and

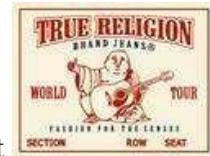
(iii) shipping, delivering, holding for sale, distributing, returning, transferring or otherwise moving, storing or disposing of in any manner jeanswear, sportswear, accessories or other items falsely bearing the TRUE RELIGION Marks and True Religion Copyrights, or any reproduction, counterfeit, copy or colorable imitation of same; and

(iv) utilizing the Infringing Domain Names and registering any additional domain names that use or incorporate any of the TRUE RELIGION Marks; and

(v) operating and/or hosting Defendants' Infringing Web Sites.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, pursuant to 17 U.S.C.

§ 504(c)(2), True Religion is awarded maximum statutory damages for willful copyright infringement of one hundred and fifty thousand dollars and no cents (\$150,000.00) against each



Defendant for its willful infringement of the True Religion Copyright (Copyright Reg. No. VA 1,698,310); and

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that, pursuant to 15 U.S.C.

§ 1117(c)(2), True Religion is awarded maximum statutory damages for willful trademark counterfeiting of two million dollars and no cents (\$2,000,000.00) against each Defendant for its counterfeiting of the TRUE RELIGION Mark "TRUE RELIGION," and is awarded maximum statutory damages for willful trademark counterfeiting of two million dollars (\$2,000,000.00) and no cents against each Defendant for its counterfeiting of the TRUE RELIGION Mark



, and is awarded maximum statutory damages for willful trademark counterfeiting of two million dollars (\$2,000,000.00) and no cents against each Defendant for its



counterfeiting of the TRUE RELIGION Mark ; and is awarded maximum statutory damages for willful trademark counterfeiting of two million dollars (\$2,000,000.00) and no cents



against each Defendant for its counterfeiting of the TRUE RELIGION Mark , for a total award of statutory damages in the amount of eight million one hundred and fifty thousand dollars and no cents (\$8,150,000.00) against each Defendant; and

IT IS FURTHER ORDERED that monies currently restrained in various Defendants' accounts held by PayPal, Inc. ("PayPal"), are hereby released to True Religion as partial payment of the above-mentioned damages; and

IT IS FURTHER ORDERED that, in accordance with 15 U.S.C. § 1116(a) and this Court's inherent equitable power, the domain name registries, including but not limited to VeriSign, Inc., NeuStar, Inc., Afilias Limited and Public Interest Registry, and/or the individual registrars holding or listing one or more domain names used in conjunction with Defendants' Infringing Web Sites, as set forth in Exhibit 1 attached hereto, shall, within three (3) days after receipt of notice of this Permanent Injunction, disable and/or continue to disable the domain names used in conjunction with Defendants' Infringing Web Sites, through a registry hold or otherwise, and make them inactive and untransferable; and

IT IS FURTHER ORDERED that, in accordance with 15 U.S.C. § 1116(a) and this Court's inherent equitable power, the domain name registries, including but not limited to VeriSign, Inc., NeuStar, Inc., Afilias Limited, and Public Interest Registry, and/or the individual registrars holding or listing one or more of the domain names associated with Defendants' Infringing Web Sites, shall, within thirty (30) days after receipt of notice of this Permanent

Injunction, transfer the domain names associated with Defendants' Infringing Websites, including but not limited to those set forth in Exhibit 1 attached hereto, to True Religion's ownership and control, including, *inter alia*, by changing the registrar of record to the registrar of True Religion's choosing, unless True Religion requests that the domain name registration for specific domain names be deleted rather than transferred; and

IT IS FURTHER ORDERED that in accordance with this Court's inherent equitable powers and its power to coerce compliance with its lawful orders, until True Religion has recovered the full payment of monies owed to them by any Defendant under this Permanent Injunction, in the event True Religion discovers new monies or accounts belonging to or controlled by any Defendant, True Religion shall have the ongoing authority to serve this Permanent Injunction on any party controlling or otherwise holding such accounts, including but not limited to PayPal or other merchant account providers, payment providers, or third party processors (collectively, "Account Holder"); and

IT IS FURTHER ORDERED that Account Holder shall immediately locate and restrain all accounts belonging to or controlled by such Defendant from transferring or disposing of any money, stocks or other of such Defendant's assets, not allowing such funds to be transferred or withdrawn by such Defendant and shall provide True Religion with the information relating to those websites and/or accounts; and

IT IS FURTHER ORDERED that after thirty (30) days following the service of this Permanent Injunction on such Defendant and Account Holder, Account Holder shall transfer all monies in the restrained accounts to True Religion, unless the Defendant has filed with the Court and served upon Plaintiffs' counsel a request that such monies be exempted from this Permanent Injunction; and

IT IS FURTHER ORDERED, that any Defendant may upon two (2) days' written notice to the Court and True Religion's counsel, upon proper showing, appear and move for the dissolution or modification of the provisions of this Permanent Injunction concerning the restriction upon transfer of such new monies or accounts belonging to or controlled by any Defendant; and

IT IS FURTHER ORDERED that in accordance with this Court's inherent equitable powers and its power to coerce compliance with its lawful orders, and due to Defendants' ongoing proliferation of domain names for operation of their counterfeiting activities, in the event True Religion discovers any new domain names ("Newly-Detected Domains") registered or operated by any Defendant containing the TRUE RELIGION Marks or marks confusingly similar thereto and/or used in conjunction with the sale of Counterfeit Products, True Religion may move the Court for a supplemental order ("Supplemental Order") identifying the Newly-Detected Domains; and

IT IS FURTHER ORDERED that the domain name registries and/or the individual registrars holding and/or listing one or more of the Newly-Detected Domains, upon receiving notice of a Supplemental Order identifying Newly-Detected Domains, shall, within seven (7) days, temporarily disable any Newly-Detected Domains and make them inactive and untransferable; and

IT IS FURTHER ORDERED that after thirty (30) days following the service of such a Supplemental Order, the domain name registries and/or the individual registrars holding and/or listing one or more of the Newly-Detected Domains, shall, transfer the Newly-Detected Domains to the ownership and control of True Religion including, *inter alia*, by changing the registrar of record to the registrar of True Religion's choosing, unless the Defendant has filed with the Court and served upon True Religion's counsel a request that such Newly-Detected Domains be

exempted from this Permanent Injunction or unless True Religion requests that the domain name registration for specific domain names be deleted rather than transferred; and

IT IS FURTHER ORDERED, that any Defendant may upon two (2) days' written notice to the Court and the True Religion's counsel, upon proper showing, appear and move for the dissolution or modification of the provisions of this Permanent Injunction or Supplemental Order concerning the restriction upon transfer of such Newly-Detected Domains belonging to or controlled by any Defendant; and

IT IS FURTHER ORDERED that True Religion may continue to obtain discovery by providing actual notice, pursuant to subpoena or otherwise, of this Permanent Injunction to any of the following: (1) Defendants, their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them; (2) any banks, savings and loan associations, payment processors or other financial institutions, including without limitation, PayPal, or other merchant account providers, payment providers, third party processors, credit card associations (e.g., MasterCard and VISA), which receive payments or hold assets on Defendants' behalf; and (3) any third party service providers, including without limitation, ISPs, back-end service providers, web designers, sponsored search engine or ad-word providers, shippers, domain name registrars, or online third-party selling platforms who have provided services for Defendants (collectively "Third Party Service Providers"); and it is further

ORDERED, that any third party providing services in connection with any Defendant and/or Defendants' Infringing Web Sites, including without limitation, banks, merchant account providers including PayPal, and Third Party Service Providers shall within fourteen (14) days after receipt of such notice, provide copies of all documents and records in such person or entity's possession or control relating to:

(a) The identities and addresses of Defendants, their agents, servants, employees, confederates, and any persons acting in concert or participation with them and the locations and identities of Defendants' operations, including without limitation, identifying information associated with Defendants' websites, Infringing Domain Names and financial accounts;

(b) Defendants' Infringing Web Sites;

(c) The Infringing Domain Names or any domain name registered by Defendants; and

(d) Any financial accounts owned or controlled by Defendants, including their agents, servants, employees, confederates, attorneys, and any persons acting in concert or participation with them, including such accounts residing with or under the control of any banks, savings and loan associations, payment processors or other financial institutions, including without limitation, PayPal, Western Union, or other merchant account providers, payment providers, third party processors, credit card associations (e.g., MasterCard and VISA); and it is further

IT IS FURTHER ORDERED that the bond posted by True Religion is hereby released;

IT IS FINALLY ORDERED that this Court shall retain jurisdiction over the parties and the subject matter of this litigation for the purpose of interpretation and enforcement of this Default Judgment and Permanent Injunction Order.

This is a FINAL JUDGMENT.

SIGNED this \_\_\_\_ day of \_\_\_\_\_ 2012.

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THE HONORABLE HAROLD BAER, JR.

**EXHIBIT 1**

<b><u>Infringing Websites</u></b>
2011truereligionoutlet.com
aaanbajersey.com
attruereligionband.com
bagsoutletss.com
bestkf.com
besttruereligionjeans.com
brandjeansonline.org
brandjeansonweb.com
brandjeanssupply.com
brandstribe.com
brand-truereligionjeans.com
brandtshirt.com
buyjeansonlinestore.com
buytruereligionjeans.net
buytruereligionjeans.us
cheapertruereligionjeans.com
cheapertruereligionjeans.net
cheapesttruereligion.com
cheapfashionjeans.com
cheapjeans4sales.com
cheapjeans-outlet.com
cheapjeanssale2.com
cheapjeanstruereligion.info
cheap-skys.com
cheaptrjeans.com
cheaptruereligion.co.uk
cheaptruereligion.us
cheaptruereligion8.com
cheaptrue-religionjeans.com
cheap-true-religion-jeans.com
cheaptruereligionjeans2.com
cheaptruereligionjeans2011.com
cheaptruereligionjeans2u.com
cheaptruereligionjeans7.com
cheaptruereligionjeansforsale.com
cheaptruereligionjeansforsale.net
cheaptruereligionjeansoutlet.com
cheap-truereligionjeansoutlet.com

cheaptruereligionjeansoutlets.com
cheaptruereligionjeansoutlets.net
cheaptruereligionjeans-sale.com
cheaptruereligionjeanssale.net
cheaptruereligionjeanssale.net
cheaptruereligionjeanssale.org
cheap-truereligionoutlet.com
cheaptruereligion-outlet.com
cheap-true-religion-outlet.com
cheaptruereligionoutlets.com
cheaptruereligionshop.com
cheaptruereligionjeans.info
cheapusajeans.com
cheerwholesale.com
clothingshelf.com
clothingshoes777.com
cyberdealing.com
discountrjeans.com
discount-true-religion-jeans-online.com
dsquared2sale.net
dsquared2sales.com
eschoose.com
fadtruereligionjeans.com
faketruereligion.net
fangle-brands.com
fashionchoose.com
fashionjeanshop.com
fortruereligionjeans.com
franklinmarshalls.com
goeasyshop.com
gotradingzone.com
gucciclothingchina.com
hiclothing.com
hitruereligion.com
hotjeansell.com
hottruereligion.com
hottruereligionjeans.com
ineedjeans.com
intruereligion.com
inttopbrand.com

jeanscheapsale.org
jeansclassic.net
jeans-discount.org
jeansfake.org
jeansflare.com
jeansonlineoutlet.com
jeansonweb.com
jeansoutletnew.com
jeansstorecheap.com
jeans-true-religion.com
jeanstruereligioncheap.com
jeanstruereligionoutlet.com
jeans-true-religion-outlet.com
jeans-truereligions.com
jeans-true-religions.com
jeanswholesaler.org
jeanswholesaling.com
longfengtrade.com
moriver-trade.com
mycheaptruereligionjeans.com
myfashionjeans.com
newjeansoutlet.com
newtruereligionsale.com
nikecool.com
officialtruereligion.com
oursst.com
outeltruereligion.com
outeltruereligions.com
outlet-jeans.com
outletstruereligion.com
outlet-truereligion.com
pengfashionshoes.com
picktruereligionjeans.com
poeon.com
qiquwang.net
realtruereligionjeans.com
religionjeansuk.com
religionoutlets.com
salestruereligion.com
sale-truereligionjeans.org

saletruereligionoutlet.com
saletruereligiousjeans.info
the9thstreet.com
thebestkf.com
thetruereligionjeansoutlet.us
tinrui.com
toptrjeans.com
toptruereligionjeans.com
toshoesa.com
trade88cn.com
tradehong.com
trademoment.com
tradeonworld.com
tradeoverworld.com
tradevoid.com
tradevoid.net
trjeansk.com
trjeans-online.com
trjeansonlineshop.com
truejeansreligionsale.com
truereligion1-jeans.com
truereligion2cheap.com
truereligion2sale.com
truereligion4outlet.com
truereligion4sale.com
truereligion4sales.info
truereligion4u.org
truereligionall.com
truereligionaustralia.info
truereligionbestjeans.com
truereligionbillig.net
truereligionbrand-jeans.com
truereligionbrand-jeans.org
truereligionbrandjeans-outlet.com
truereligionbrandjeansstore.com
truereligioncanada.info
truereligion-cheap.com
truereligion-clothing.com
truereligiondeutschland.org
truereligionee.com

truereligiones.com
truereligionfactoryoutlet.net
truereligion-forsale.com
truereligionjean.org
truereligionjean4u.com
truereligionjean4u.net
truereligionjeancanada.info
truereligionjeanoutlet.com
truereligionjeanoutlet1.com
truereligionjeanoutlet1.com
truereligionjeanoutlet1.info
truereligionjeans.uk.net
truereligionjeans2011.info
truereligionjeans2sale.com
truereligionjeans4cheap.com
truereligionjeans4online.com
truereligionjeans4outlet.com
truereligionjeans4sale.com
truereligionjeans4u.net
truereligionjeans7.com
truereligionjeansales.com
truereligionjeansbox.com
truereligionjeanscheap.net
truereligionjeanscheap.org
truereligionjeanscheap.us
truereligionjeansdeal.com
truereligionjeansdiscounted.com
truereligionjeansforcheap.com
truereligionjeansmens.com
truereligionjeansnederland.com
truereligionjeansnew.com
truereligionjeansok.com
truereligionjeansonline.com
truereligionjeansoutlet.biz
truereligionjeans-outlet.cc
truereligionjeans-outlet.com
true-religion-jeans-outlet.com
truereligionjeans-outlet.info
truereligionjeansoutlet.us
truereligionjeansoutlet1.com

truereligionjeansoutlet8.com
truereligionjeans-outlets1.info
truereligionjeansss.net
truereligionjeanssale.cc
truereligionjeanssales.com
truereligionjeanssell.net
truereligionjeansuk.com
truereligionjeansus.net
truereligionjeansusa.us
truereligionjeansweb.com
truereligionjeanswholesale.org
truereligionjians.com
truereligionlike.com
truereligionmenjean.com
truereligionofficial.net
truereligiononlinesale.com
truereligiononsale.net
truereligiononsalejeans.com
truereligionoutlet.cc
truereligion-outlet.cc
truereligionoutlet.info
truereligionoutlet.net
truereligion-outlet.net
truereligionoutlet.us
truereligionoutlet2011.com
truereligionoutlet3.com
truereligionoutlet4sale.com
truereligionoutlet4u.net
truereligionoutlet7.com
truereligionoutlet8.com
true-religion-outlet-ca-no1.info
truereligionoutletes.com
truereligionoutletforcheap.com
truereligionoutletjeans.cc
truereligionoutletjeans.info
truereligion-outletjeans.info
truereligionoutlet-jeans.info
true-religion-outlet-jeans.info
truereligionoutletjeans-new.info
truereligionoutletmall.com

truereligionoutlet-online.com
truereligionoutletonline.net
truereligionoutlet-sale.com
truereligionoutletsale.info
truereligionoutlet-sale.info
truereligionoutlet-sales.info
truereligionoutlet-stores.com
truereligionoutletsusa.com
truereligionoutletusa.com
truereligionsale.co.uk
truereligionsale7.com
truereligionsaleonline.com
truereligionsaleoutlet.com
truereligionsales.org
truereligionsalestore.com
truereligionsalesuk.com
truereligionbrandjeans.net
truereligioncheap.com
truereligionseries.com
truereligionseries.net
true-religion-shorts.com
true-religions-jean.com
truereligionjeancheap.com
truereligionjeancheap.info
truereligionjeans.info
truereligionjeans4sale.com
truereligionjeansale.com
truereligionjeansoutlet.com
truereligionoutlets2011.net
truereligionstore.net
truereligionstore.us
truereligiontrade.net
truereligiontrofficial.com
truereligion-uk.co.uk
truereligionukjeans.com
truereligionzone.com
uktruereligion.com
uktruereligionbrandjeans.com
ulstyle.com
usa-jeans.com

v9mall.com
viptruereligion.com
wiwittrade.com
world203.com